

**To:** Berkley, Bruce[Berkley.Bruce@epa.gov]; Beck, Nancy[Beck.Nancy@epa.gov]  
**Cc:** Jakob, Avivah[Jakob.Avivah@epa.gov]  
**From:** Scott, Gregory  
**Sent:** Thur 7/20/2017 3:58:13 PM  
**Subject:** RE: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

# Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

### EPA Materials Attached (3 files)

- 2014 revised human health risk assessment,  
<https://www.regulations.gov/document?D=EPA-HQ-OPP-2008-0850-0195>
- 2016 Revised Human Health Risk Assessment,  
<https://www.regulations.gov/document?D=EPA-HQ-OPP-2015-0653-0454>
- Chlorpyrifos: Analysis of Biomonitoring Data, 2016 SAP Issue Paper,  
<https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0062-0005>

### Links to Chlorpyrifos and related issues SAP docket numbers:

- [EPA-HQ-OPP-2007-1005](#) Petition docket number
- [EPA-HQ-OPP-2008-0274](#) September 16 – 18, 2008: The Agency's Evaluation of the Toxicity Profile of Chlorpyrifos
- [EPA-HQ-OPP-2009-0687](#) December 1-4, 2009: Scientific Issues Associated with Field Volatilization of Conventional Pesticides
- [EPA-HQ-OPP-2009-0851](#) February 2-4, 2010: Incorporation of Epidemiology and Human Incident Data into Human Risk Assessment
- [EPA-HQ-OPP-2011-0284](#) February 15-18, 2011: Chlorpyrifos Physiologically-Based Pharmacokinetic/Pharmacodynamic (PBPK/PD) Modeling linked to the Cumulative and Aggregate Risk Evaluation System (CARES)
- [EPA-HQ-OPP-2012-0040](#) April 10 – 12, 2012: Scientific Issues Concerning Health Effects

of Chlorpyrifos

- EPA-HQ-OPP-2016-0062 April 19-21, 2016: Chlorpyrifos: Analysis of Biomonitoring Data

### **USDA Materials Attached (7 files) & Links**

- EPA-HQ-OPP-2016-0062-0136\_USDA\_Comment\_SAPdocket\_050916: USDA comment submitted to the SAP docket, <https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0062-0136>
- Transcript of April 19-21 2016 SAP Meeting: Page 411, line 22 through page 415, line 8, [https://www.epa.gov/sites/production/files/2016-05/documents/fifra\\_sap\\_04\\_19\\_16\\_to\\_04\\_21\\_16\\_final\\_transcript.pdf](https://www.epa.gov/sites/production/files/2016-05/documents/fifra_sap_04_19_16_to_04_21_16_final_transcript.pdf)
- EPA-HQ-OPP-2008-0850-0833\_USDA\_RHHRA\_Comment: USDA's comment on the Revised Human Health Risk Assessment that published January 2015, <https://www.regulations.gov/document?D=EPA-HQ-OPP-2008-0850-0833>
- EPA-HQ-OPP-2015-0653-0369\_USDA\_ProposedRuleComment (note: three attachments): USDA's comments on the October 2015 proposed tolerance revocation – three attachments, one is the comment they submitted on the revised human health risk assessment (above), <https://www.regulations.gov/document?D=EPA-HQ-OPP-2015-0653-0369>
- EPA-HQ-OPP-2015-0653-0648\_USDA\_NODA\_Comment: USDA's Comments on the November 2016 NODA, <https://www.regulations.gov/document?D=EPA-HQ-OPP-2015-0653-0648>

**Gregory Scott**  
Resource Management Staff  
Office of Chemical Safety and Pollution Prevention

**Ex. 6 - Personal Privacy**

**From:** Scott, Gregory

**Sent:** Thursday, July 20, 2017 11:33 AM

**To:** Berkley, Bruce <Berkley.Bruce@epa.gov>; Beck, Nancy <beck.nancy@epa.gov>

**Cc:** Jakob, Avivah <Jakob.Avivah@epa.gov>

**Subject:** RE: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

**OPP has provided the following attached documents for submission to OCFO:**

- [December 2014 Revised Human Health Risk Assessment for registration review](#)
- [March 2016 Chlorpyrifos Issue Paper: Evaluation of Biomonitoring Data from Epidemiology Studies \(supporting SAP\)](#)
- [November 2016 Revised Human Health Risk Assessment for registration review](#)

**They also provided the following references/links to the various public dockets with additional documentation, if necessary:**

Chlorpyrifos and related issues SAP docket numbers:

- [EPA-HQ-OPP-2008-0274](#) September 16 – 18, 2008: The Agency’s Evaluation of the Toxicity Profile of Chlorpyrifos
- [EPA-HQ-OPP-2009-0687](#) December 1-4, 2009: Scientific Issues Associated with Field Volatilization of Conventional Pesticides
- [EPA-HQ-OPP-2009-0851](#) February 2-4, 2010: Incorporation of Epidemiology and Human Incident Data into Human Risk Assessment
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- [EPA-HQ-OPP-2012-0040](#) April 10 – 12, 2012: Scientific Issues Concerning Health Effects of Chlorpyrifos
- [EPA-HQ-OPP-2016-0062](#) April 19-21, 2016: Chlorpyrifos: Analysis of Biomonitoring Data

2016 SAP Issue Paper (also attached): <https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0062-0005>

Registration Review docket number: [EPA-HQ-OPP-2008-0850](#)

2014 revised human health risk assessment (which also supported the October 2015 proposed tolerance revocation): <https://www.regulations.gov/document?D=EPA-HQ-OPP-2008-0850-0195> (also attached as a PDF)

Tolerance Rulemaking docket number: [EPA-HQ-OPP-2015-0653](#)

2016 Revised Human Health Risk Assessment, attached (also associated with the Notice of Data Availability): <https://www.regulations.gov/document?D=EPA-HQ-OPP-2015-0653-0454>

Petition docket number: [EPA-HQ-OPP-2007-1005](#)

**Gregory Scott**  
Resource Management Staff  
Office of Chemical Safety and Pollution Prevention

**Ex. 6 - Personal Privacy**

**From:** Berkley, Bruce  
**Sent:** Thursday, July 20, 2017 9:55 AM  
**To:** Scott, Gregory <[Scott.Gregory@epa.gov](mailto:Scott.Gregory@epa.gov)>; Beck, Nancy <[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)>  
**Cc:** Jakob, Avivah <[Jakob.Avivah@epa.gov](mailto:Jakob.Avivah@epa.gov)>

**Subject:** RE: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

Thanks Greg. We will need to

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Bruce Berkley

Deputy Director, OCSPP

Office of Program Management Operations

**Ex. 6 - Personal Privacy**

**From:** Scott, Gregory

**Sent:** Thursday, July 20, 2017 9:54 AM

**To:** Berkley, Bruce <[Berkley.Bruce@epa.gov](mailto:Berkley.Bruce@epa.gov)>; Beck, Nancy <[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)>

**Cc:** Jakob, Avivah <[Jakob.Avivah@epa.gov](mailto:Jakob.Avivah@epa.gov)>

**Subject:** RE: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

We're working with OPP right now to get the various EPA docs. They are recommending

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**Gregory Scott**

Resource Management Staff

Office of Chemical Safety and Pollution Prevention

**Ex. 6 - Personal Privacy**

**From:** Berkley, Bruce  
**Sent:** Thursday, July 20, 2017 9:53 AM  
**To:** Beck, Nancy <[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)>  
**Cc:** Scott, Gregory <[Scott.Gregory@epa.gov](mailto:Scott.Gregory@epa.gov)>; Jakob, Avivah <[Jakob.Avivah@epa.gov](mailto:Jakob.Avivah@epa.gov)>  
**Subject:** RE: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

We will check with Rick to get his input on this.

Thanks,

Bruce Berkley

Deputy Director, OCSPP

Office of Program Management Operations

Ex. 6 - Personal Privacy

**From:** Beck, Nancy  
**Sent:** Thursday, July 20, 2017 9:51 AM  
**To:** Berkley, Bruce <[Berkley.Bruce@epa.gov](mailto:Berkley.Bruce@epa.gov)>  
**Cc:** Scott, Gregory <[Scott.Gregory@epa.gov](mailto:Scott.Gregory@epa.gov)>; Jakob, Avivah <[Jakob.Avivah@epa.gov](mailto:Jakob.Avivah@epa.gov)>  
**Subject:** RE: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

## Ex. 5 - Deliberative Process

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Nancy B. Beck, Ph.D., DABT

Deputy Assistant Administrator, OCSPP

**Ex. 6 - Personal Privacy**

[beck.nancy@epa.gov](mailto:beck.nancy@epa.gov)

**From:** Berkley, Bruce

**Sent:** Thursday, July 20, 2017 9:44 AM

**To:** Beck, Nancy <[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)>

**Cc:** Scott, Gregory <[Scott.Gregory@epa.gov](mailto:Scott.Gregory@epa.gov)>

**Subject:** FW: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

Hi Nancy,

**Ex. 5 - Deliberative Process**

Thanks,

Bruce

**Excerpt from HAC Hearing Transcript**

Ms. MCCOLLUM. ...For example, the pesticide ban, which I mentioned in my opening statement, and its chlorpyrifos. Everybody says it differently because nobody knows how to say it right, right? But it is important that we do learn how to say it right because this chemical is very dangerous.

In December 2014, the EPA completed a human revised health risk assessment, and it was very highly sophisticated.

It was thoroughly peer reviewed. I know you said one of your goals is rule of law, but I think when science is looking at what to do about pesticides and toxins in our chemicals, they have to do no harm as their first goal.

The EPA determined that there is serious concern for long-term and neurodevelopment effects as a result of prenatal and possibly early life exposure. The Agency could not come up with any level that was safe on this toxin, and they do come up with some toxins that they find safe levels with. But on this one, they could not find anything.

So, I am curious to know, you know, you were there a month, and then this is reviewed. How did you come to find yourself disavowing going backwards, not looking at any of the scientific peer review on this pesticide? And then, with all the other cuts and the cuts in research, how am I going to have confidence that the best science that was used, that we do no harm to women who are pregnant, we do no harm to children who are born with, you know, possibly having all

these toxins lingering in their systems?

Mr. PRUITT. ...With respect to the decision on chlorpyrifos, the USDA had a completely



different perspective, and, in fact, had made the EPA aware of that as the process was ongoing. And we based that decision, like we base every decision, it was based on meaningful data, meaningful science, and it was a decision that we felt that was merited based upon that, and a collection of information that we considered.

Ms. MCCOLLUM. Could you provide this committee with the peer science from the other agency as well as the science from this Agency?

Mr. PRUITT. The USDA . We will provide that, yes.

Ms. MCCOLLUM. I want their peer reviewed science by comparable scientists, not someone's opinion. Okay.

Bruce Berkley

Deputy Director, OCSPP

Office of Program Management Operations

## **Ex. 6 - Personal Privacy**

**From:** Scott, Gregory

**Sent:** Thursday, July 20, 2017 8:28 AM

**To:** Berkley, Bruce <[Berkley.Bruce@epa.gov](mailto:Berkley.Bruce@epa.gov)>

**Subject:** FW: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

Do we need

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**Gregory Scott**  
Resource Management Staff  
Office of Chemical Safety and Pollution Prevention

## Ex. 6 - Personal Privacy

**From:** Guilaran, Yu-Ting  
**Sent:** Wednesday, July 19, 2017 4:57 PM  
**To:** Scott, Gregory <[Scott.Gregory@epa.gov](mailto:Scott.Gregory@epa.gov)>  
**Cc:** Layne, Arnold <[Layne.Arnold@epa.gov](mailto:Layne.Arnold@epa.gov)>; Katz, Brian <[Katz.Brian@epa.gov](mailto:Katz.Brian@epa.gov)>; Dinkins, Darlene <[Dinkins.Darlene@epa.gov](mailto:Dinkins.Darlene@epa.gov)>; Shimkin, Martha <[Shimkin.Martha@epa.gov](mailto:Shimkin.Martha@epa.gov)>; Berkley, Bruce <[Berkley.Bruce@epa.gov](mailto:Berkley.Bruce@epa.gov)>; Moore, Deon <[Moore.Deon@epa.gov](mailto:Moore.Deon@epa.gov)>; Vogel, Dana <[Vogel.Dana@epa.gov](mailto:Vogel.Dana@epa.gov)>; Lowit, Anna <[Lowit.Anna@epa.gov](mailto:Lowit.Anna@epa.gov)>; Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>; Friedman, Dana <[Friedman.Dana@epa.gov](mailto:Friedman.Dana@epa.gov)>  
**Subject:** FW: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

Hi Gregory

## Ex. 5 - Deliberative Process

### Attachments

• [REDACTED] EPA-HQ-OPP-2016-0062-0136\_USDA\_Comment\_SAPdocket\_050916: USDA

comment submitted to the SAP docket

- [REDACTED] Transcript of April 19-21 2016 SAP Meeting: Page 411, line 22 through page 415, line 8
- [REDACTED] EPA-HQ-OPP-2008-0850-0833\_USDA\_RHHRA\_Comment: USDA's comment on the Revised Human Health Risk Assessment that published January 2015
- [REDACTED] EPA-HQ-OPP-2015-0653-0369\_USDA\_ProposedRuleComment (note: three attachments): USDA's comments on the October 2015 proposed tolerance revocation – three attachments, one is the comment they submitted on the revised human health risk assessment (above)
- [REDACTED] EPA-HQ-OPP-2015-0653-0648\_USDA\_NODA\_Comment: USDA's Comments on the November 2016 NODA

Regards,

Yu-Ting Guilaran, P.E.

Director

Pesticide Re-evaluation Division (PRD)

Office of Pesticide Programs

Office of Chemical Safety and Pollution Prevention

**Ex. 6 - Personal Privacy**

Room number PY S9623

**From:** Keigwin, Richard

**Sent:** Wednesday, July 19, 2017 12:29 PM

**To:** Scott, Gregory <[Scott.Gregory@epa.gov](mailto:Scott.Gregory@epa.gov)>

**Cc:** Layne, Arnold <[Layne.Arnold@epa.gov](mailto:Layne.Arnold@epa.gov)>; Katz, Brian <[Katz.Brian@epa.gov](mailto:Katz.Brian@epa.gov)>; Dinkins, Darlene <[Dinkins.Darlene@epa.gov](mailto:Dinkins.Darlene@epa.gov)>; Shimkin, Martha <[Shimkin.Martha@epa.gov](mailto:Shimkin.Martha@epa.gov)>; Berkley, Bruce <[Berkley.Bruce@epa.gov](mailto:Berkley.Bruce@epa.gov)>; Moore, Deon <[Moore.Deon@epa.gov](mailto:Moore.Deon@epa.gov)>; Guilaran, Yu-Ting <[Guilaran.Yu-Ting@epa.gov](mailto:Guilaran.Yu-Ting@epa.gov)>; Vogel, Dana <[Vogel.Dana@epa.gov](mailto:Vogel.Dana@epa.gov)>; Lowit, Anna <[Lowit.Anna@epa.gov](mailto:Lowit.Anna@epa.gov)>

**Subject:** Re: House Appropriations Committee Request for Chlorpyrifos Data & Documentation

## Ex. 5 - Deliberative Process

Rick Keigwin

Acting Director, Office of Pesticide Programs

U.S. Environmental Protection Agency

Sent from my iPhone

On Jul 19, 2017, at 12:10 PM, Scott, Gregory <[Scott.Gregory@epa.gov](mailto:Scott.Gregory@epa.gov)> wrote:

Hi Rick et al,

## Ex. 5 - Deliberative Process

OCFO?

Thank you,

Greg

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**Gregory Scott**  
Resource Management Staff  
Office of Chemical Safety and Pollution Prevention

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